

Abdul Hassan Law Group, PLLC
215-28 Hillside Avenue
Queens Village, New York, 11427

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**Abdul K. Hassan, Esq.**  
Email: [abdul@abdulhassan.com](mailto:abdul@abdulhassan.com)  
*Employment and Labor Lawyer*

Tel: 718-740-1000  
Fax: 718-740-2000  
Web: [www.abdulhassan.com](http://www.abdulhassan.com)

**February 13, 2020**

**Via ECF**

Hon. Lewis J. Liman, USDJ  
United States District Court, SDNY  
500 Pearl Street, Courtroom 15C  
New York, NY 10007-1312  
Tel: 212-805-0226

**Re: Premnauth v. 450 Concord Avenue Corp.**  
**Case No. 19-CV-09077 (LL)(SN)**  
**Motion for Extension of Time**

Dear Judge Liman:

My firm represents Plaintiff in the above-referenced action, and I respectfully write to request a 30-day extension to respond to the Court's February 6, 2020 order. The additional time is needed to confer with defense counsel and to further investigate/evaluate the issues raised in her February 5, 2020 letter to the Court. (See ECF No. 15). For example, it may be that Defendant continues to operate but under a different name and/or successor in interest. We will also evaluate the issue of individual liability under the FLSA as well as seeking a default judgment. If the case is settled/resolved, we will notify the Court promptly. No prior request for an extension of this deadline was made.

We thank the Court in advance for its time and consideration.

Respectfully submitted,


Abdul Hassan Law Group, PLLC

/s/ Abdul Hassan  
By: Abdul K. Hassan, Esq.  
*Counsel for Plaintiff*

Extension GRANTED. Plaintiff's deadline to inform the Court by letter how it intends to proceed in light of Defendant's letter from February 6, 2020 (Dkt. No. 15) is extended to March 13, 2020.  
SO ORDERED. 2/18/2020.

cc: Defense Counsel via ECF

SO ORDERED.

  
LEWIS J. LIMAN  
United States District Judge